



Use of the Clean Water State Revolving Fund (CWSRF) to Implement Security Measures at Publicly-owned Wastewater Treatment Works

Every American needs to be confident that the discharge from their community wastewater treatment plant is safe. Adequate protection of publicly-owned treatment works (POTW) conveyance and treatment systems has been an important goal of the Environmental Protection Agency's (EPA) wastewater program. Since the terrorist attacks of September 11, 2001, we have received questions from states about the eligibility of security measures for financial assistance through the Clean Water State Revolving Fund (CWSRF).

While the events of September 11 have focused attention on this matter, it is important to note that POTWs have always worked to protect facilities from vandalism and have monitored influent waste streams to assess their vulnerability to industrial discharges. EPA encourages state wastewater programs and CWSRF programs to continue to work with POTWs to help them identify their vulnerability to security threats and vandalism and take steps to ensure protection of the public health of their customers. This fact sheet discusses the types of projects that may be fundable through the CWSRF that will help POTWs ensure the protection of their facilities.

What is the CWSRF program?

The EPA CWSRF program provides grant funding to states to allow them to assist POTWs to make infrastructure improvements needed to protect public health and ensure compliance with the Clean Water Act. States may use CWSRF monies to provide low or zero percent interest rate loans to municipalities for wastewater infrastructure, including facility and sewer construction and rehabilitation, storm water management, and combined sewer and sanitary overflow correction.

What can wastewater utilities do to ensure security?

Water utilities can take straightforward, commonsense actions to increase security and reduce threats from terrorism. Areas in which to focus attention, as recommended by the Association of Metropolitan Sewerage Agencies, the Association of State and Interstate Water Pollution Control Administrators, the Water Environment Federation, and other leading professional organizations, include guarding against unplanned physical intrusion, making security a priority for employees, coordinating actions for effective emergency response and investing in security and infrastructure improvements.

What security measures can be funded through the CWSRF?

States may provide CWSRF assistance to POTWs to allow them to complete vulnerability assessments and contingency and emergency response plans. Many of the types of infrastructure improvements a wastewater system could need to take to ensure security are also eligible for CWSRF funding and may have already been included within the scope of infrastructure projects funded through the program to date. Table 1 identifies specific activities that POTWs could take to ensure the security of their systems and indicates if the activity would be eligible through the CWSRF program.

Security Measures and Eligibility under the CWSRF Program

Type of Activity	Eligible under CWSRF
General	
Vulnerability Assessments	Yes
Contingency/Emergency Response Plans	Yes
Facility	
Security Guards	No
Fencing	Yes
Security Cameras/Lighting	Yes
Motion Detectors	Yes
Redundancy (systems and power)	Yes
Secure Chemical and Fuel Storage	Yes
Lab Equipment	Yes
Monitoring	No
Sewer System	
Securing Large Sanitary Sewers	Yes
Tamper-proof Manholes	Yes

What security measures cannot be funded through the CWSRF?

It should be noted that maintaining a human presence can be the most important security measure a POTW can take to ensure that its facilities are protected. The CWSRF program cannot fund operations and maintenance activities for POTWs and therefore could not provide financing for an increased human security presence. Likewise, the CWSRF program cannot provide assistance to help a system purchase the chemicals needed to increase disinfection.

How will states fund POTW projects?

If a municipality is interested in obtaining financing to implement security measures, the first step in seeking assistance is to contact the state CWSRF representative - who can be found on the Office of Wastewater Management website at <http://www.epa.gov/owm/finan.html>.

Typically, any project that will receive CWSRF funding must go through public review as part of development of an annual Intended Use Plan which lays out how the state will implement its CWSRF program over the subsequent year. States do, however, have the ability to include procedures in their programs that can allow them to fund emergency projects. Each state should consider the proposals they receive from municipalities in order to make a determination as to whether the proposed improvement would qualify as an emergency project that should be addressed immediately.

In some cases the types of activities that will need to be implemented may have a longer time horizon. For example, some communities are switching their treatment process to eliminate the use of gaseous chlorine. This type of project, which may require time for design and planning, will be on a longer timeline than a project needed to install adequate security fencing, and would thus go through the traditional process for funding CWSRF projects.

Where can I find more information?

The Agency is coordinating with the water industry to provide information and technical assistance to states and utilities to help during this time. EPA is working collaboratively with the Association of Metropolitan Water Agencies and other groups to develop an Information Sharing and Analysis Center to bolster coordinated notification and response to threats and vulnerabilities. For additional information, you can also visit the following websites:

EPA Counter-terrorism: <http://www.epa.gov/ehtpages/ecounterterrorism.html>

EPA Alert on Chemical Accident Prevention and Site Security:

<http://www.epa.gov/ceppo/pubs/secale.pdf>

U.S. Centers for Disease Control & Prevention: <http://www.bt.cdc.gov>

Association of Metropolitan Sewerage Agencies: <http://www.amsa-cleanwater.org/>

Association of State and Interstate Water Pollution Control Administrators:

<http://www.asiwpca.org/>

National League of Cities: http://www.nlc.org/nlc_org/site/newsroom/terrorism_response

National Governors Association, Emergency Management and Terrorism:

http://www.nga.org/center/topics/1,1188,D_854,00.html

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